



366 Madison Avenue | 7th Floor
New York, New York 10017
Tel 212-453-5900 | Fax 212-453-5959

Writer's Direct Dial:
PHILIP K. DAVIDOFF
212-453-5915
pdavidoff@fordharrison.com

February 15, 2021

VIA ECF

Hon. John P. Cronan
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Rene Manzano Tiburcio, individually and on behalf of others similarly situated*
v. Pine Bar & Grill LLC (D/B/A Pine Bar + Grill), A & A Restaurant Inc. (D/B/A
Pine Bar + Grill), Anthony Bastone, Alberto Beracha, and Frank Doe

Case No. 1:20-cv-09922 (JPC)

Dear Judge Cronan:

This firm represents Defendants in the above-referenced matter. We write with Plaintiff's consent to request an extension of time for Defendants to answer or otherwise respond to Plaintiff's Complaint. The deadline for Defendants to file their responsive pleading is currently February 16, 2021. Defendants request that the deadline to file their responsive pleading be extended to February 23, 2021. This is Defendants' second request for an extension.

We thank the Court for its attention to this matter.

Sincerely,

s/ Philip K. Davidoff

Philip K. Davidoff

PKD/cao

cc: All Counsel of Record (via ECF)
WSACTIVE LLP:12064465.1